

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
TEAM SYSTEMS INTERNATIONAL, LLC, ¹)	Chapter 11
Debtor.)	Case No. 22-10066-CTG
)	
)	
)	

**NOTICE OF SECOND AMENDED² AGENDA OF MATTERS SCHEDULED FOR
VIDEO HEARING ON FEBRUARY 9, 2022 AT 1:00 P.M.³**

****WITH DIRECTION FROM THE COURT, THIS HEARING HAS BEEN ADJOURNED
TO MARCH 9, 2022 AT 9:00 A.M. ****

I. MATTER UNDER CERTIFICATE OF NO OBJECTION (CNO)

1. Motion of Debtor for Entry of an Order, Pursuant to Bankruptcy Code Sections 105(a), 327, 328, and 330, Authorizing the Debtor to Retain and Compensate Certain Professionals Utilized in the Ordinary Course of Business Filed by Team Systems International, LLC [Docket No. [24](#), filed January 25, 2022]

Objection / Response Deadline: February 2, 2022 at 4:00 p.m. (ET)

Objections / Responses Received: None.

Related Document:

- a. Certificate of No Objection to Debtor's Motion for Entry of an Order, Pursuant to Bankruptcy Code Sections 105(a), 327, 328, and 330, Authorizing the Debtor to Retain and Compensate Certain Professionals Utilized in the Ordinary Course of Business Filed by Team Systems International, LLC [Docket No. [60](#), filed February 5, 2022]
- b. Order, Pursuant to Bankruptcy Code Sections 105(a), 327, 328, and 330, Authorizing the Debtor to Retain and Compensate Certain

¹ The Debtor in this chapter 11 case has a last four digit federal tax ID of 8411. The location of the Debtor's service address in these chapter 11 case is 16192 Coastal Highway Lewes, Delaware 19958.

² **Amended items appear in bold.**

³ **The hearing previously scheduled for February 9, 2022 at 1:00 p.m. (ET), has been adjourned to March 9, 2022 at 9:00 a.m. ET.**

Professionals Utilized in the Ordinary Course of Business [Docket No. [75](#), filed February 8, 2022]

Status: On February 8, 2022, the Court entered an order approving the relief sought in the Motion. Accordingly, a hearing with respect to this matter is not necessary.

II. MATTERS GOING FORWARD

2. Motion of Debtor for Entry of Interim and Final Orders (I) Authorizing Debtor to (A) Continue Its Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Its Bank Account and Existing Business Forms, and (D) Implement Changes to the Existing Cash Management Systems as Necessary; (II) Scheduling a Final Hearing; and (III) Granting Related Relief [Docket No. [4](#), filed January 18, 2022]

Objection / Response Deadline: February 2, 2022 at 4:00 p.m. (ET)

Objections / Responses Received:

- a. Response of GPDEV, LLC, Simons Exploration, Inc. to Motion for Entry of Interim and Final Orders (I) Authorizing Debtor to (A) Continue its Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain its Bank Account and Existing Business Forms, and (D) Implement Changes to the Existing Cash Management System as Necessary [Docket No. [12](#), filed January 21, 2022]

Status: This matter is currently going forward on a final basis. Witnesses may testify. A certification of counsel will be filed prior to the hearing.

3. Application of Debtor to Employ Robinson & Cole LLP as Counsel [Docket No. [34](#), filed January 26, 2022]

Objection / Response Deadline: February 2, 2022 at 4:00 p.m. (ET)

Objections / Responses Received:

- a. Objection of GPDEV, LLC, Simons Exploration, Inc. to Debtor's Application to Employ as Counsel and Motion for Interim Compensation and Reimbursement Procedures [Docket No. [51](#), filed February 2, 2022]

Related Documents

- i. Debtor's Response to GPDEV, LLC and Simons Exploration, Inc.'s Opposition to Debtor's Application to Employ Robinson & Cole LLP as Counsel and Motion for Interim Compensation and Reimbursement Procedures [Docket No. [55](#), filed February 4, 2022]

Status: This matter is going forward.

- 4. Motion of Debtor for Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. [35](#), filed January 26, 2022]

Objection / Response Deadline: February 2, 2022 at 4:00 p.m. (ET)

Objections / Responses Received:

- a. Objection of GPDEV, LLC, Simons Exploration, Inc. to Debtor's Application to Employ as Counsel and Motion for Interim Compensation and Reimbursement Procedures [Docket No. [51](#), filed February 2, 2022]

Related Documents

- i. Debtor's Response to GPDEV, LLC and Simons Exploration, Inc.'s Opposition to Debtor's Application to Employ Robinson & Cole LLP as Counsel and Motion for Interim Compensation and Reimbursement Procedures [Docket No. [55](#), filed February 4, 2022]

Status: This matter is going forward.

- 5. Motion of Debtor for Limited Relief from Automatic Stay to Continue the Eleventh Circuit Appeal [Docket No. [38](#), filed January 26, 2022]

Objection / Response Deadline: February 2, 2022 at 4:00 p.m. (ET)

Objections / Responses Received:

- a. Objection of GPDEV, LLC, Simons Exploration, Inc. to Debtor's Motion for Limited Relief From the Automatic Stay to Continue the Eleventh Circuit Appeal [Docket No. [50](#), filed February 2, 2022]

Related Documents

- i. Debtor's Response to GPDEV, LLC and Simons Exploration, Inc.'s Opposition to Debtor's Motion for Limited Relief from Automatic Stay to Continue the Eleventh Circuit Appeal [Docket No. [59](#), filed February 4, 2022]

Status: This matter is going forward.

- 6. GPDEV, LLC, Simons Exploration, Inc.'s Motion to Dismiss Case [Docket No. [41](#), filed January 27, 2022]

Objection / Response Deadline: February 8, 2022 at 5:00 p.m. (ET)

Objections / Responses Received:

- a. Response of Bering Straits Logistics Services, LLC to Motion to Dismiss [Docket No. [65](#), filed February 7, 2022]
- b. Declaration of Krystal Nelson [Docket No. [66](#), filed February 7, 2022]

Related Documents

- i. Scheduling Order [Docket No. [21](#), entered January 24, 2022]
- ii. Witness List and Exhibit List of Bering Straits Logistics Services, LLC and Bering Straits Native Corporation for hearing [Docket No. [64](#), filed February 7, 2022]
- iii. Debtor's Combined Witness and Exhibit List for hearing [Docket No. [72](#), filed February 7, 2022]
- iv. Combined Witness and Exhibit List of United States of America for hearing [Docket No. [73](#), filed February 7, 2022]
- v. Witness List and Exhibit List of GPDEV, LLC and Simons Exploration, Inc for hearing [Docket No. 74, filed February 7, 2022]

Status: This matter is going forward. Witnesses may testify.

Dated: February 9, 2022
Wilmington, Delaware

ROBINSON & COLE LLP

/s/ Jamie L. Edmonson

Jamie L. Edmonson (No. 4247)
James F. Lathrop (No. 6492)\\
1201 N. Market Street, Suite 1406
Wilmington, Delaware 19801
Telephone: (302) 516-1700
Facsimile: (302) 516-1699
Email: jedmonson@rc.com
jlathrop@rc.com

Proposed counsel to the Debtor